

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**GLORIA PUMPHREY and
ANGALYN JONES, for themselves and on
behalf of all similarly situated individuals,**

Plaintiffs,

v.

CIVIL ACTION NO.3:11cv574

EXPERIAN INFORMATION SOLUTIONS, INC.,

Defendants.

CONSENT MOTION FOR PLAINTIFF'S ENLARGEMENT OF TIME

COMES NOW the Plaintiffs, on behalf of themselves and those individuals similarly situated, (collectively, "Plaintiffs"), by counsel, and with the consent of the Defendant, by counsel, pursuant to Fed. R. Civ. P. 6(b), moves the Court for an Enlargement of Time within which to file Plaintiff's Reply in Support of their Motion for Leave to File an Amended Complaint.

Plaintiffs' counsel represents that counsel for Defendant Experian has consented to the enlargement to allow Plaintiffs to file their Reply on or before January 29, 2013, which Reply is otherwise due today, January 24, 2013. The time in which Plaintiffs have to file a Reply has not yet expired.

Lead counsel in this matter was in the United States District Court, Richmond Division for a mediation yesterday, January 23, 2013 until 10:30 p.m. before the Honorable David Novak. In Defendant's Opposition Brief, Defendant's counsel has raised over 25 pages of mostly new arguments requiring Plaintiffs' counsel's detailed response in Plaintiffs' Reply brief.

For these reasons, the Plaintiff respectfully requests that the court extend the time for Plaintiffs' Reply, no party will be prejudiced by the extension and justice will be served with complete consideration of the evidence of record on this motion.

The Parties have attached hereto as Exhibit 1 a [proposed] Order for the Court's consideration and entry.

Respectfully submitted,

**GLORIA PUMPHREY and
ANGALYN JONES, for themselves and on
behalf of all similarly situated individuals,**

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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of January, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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